UNITED STATES OF AMERICA Before The POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMICSION OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2000

Docket No. R2000-1

OFFICE OF THE CONSUMER ADVOCATE INTERROGATORIES TO UNITED STATES POSTAL SERVICE (OCA/USPS-104-105) March 24, 2000

Pursuant to sections 26 and 27 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-1-14 dated January 24, 2000, are hereby incorporated by reference.

Respectfully submitted,

TED P. GERARDEN

Director

Office of the Consumer Advocate

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EMMETT RAND COSTICH Attorney

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OCA/USPS-104. Please confirm that

- (a) total FY 1998 volume of nonstandard single-piece First Class Letters was 376,833,521 pieces (Attachment USPS-T-24B). If you do not confirm, please provide the correct volume and its source:
- (b) total FY 1999 volume of short-paid single-piece First Class Letters was 49,496,579 pieces. (Response to OCA/USPS-69, Attachment at 2) If you do not confirm, please provide the correct volume and its source;
- (c) total FY 1999 volume of over-paid single-piece First Class Letters was 124,567,910 pieces. (Response to OCA/USPS-69, Attachment at 2) If you do not confirm, please provide the correct volume and its source;
- (d) net FY 1999 overpayment of postage for single-piece First Class Letters was \$21,508,679. (Response to OCA/USPS-69, Attachment at 2, \$26,579,416 \$5,070,737) If you do not confirm, please provide the correct amount and show its derivation.

OCA/USPS-105. Please refer to the response to OCA/USPS-69.

- (a) Please provide the same information for GFY 1998.
- (b) Please provide the information requested in OCA/USPS-69 and in part (a) of this interrogatory by shape—i.e., letters, flats, parcels.
- (c) Please confirm that the Postal Service earns additional revenue on nonstandard single-piece First Class Letters of approximately 50 percent of the revenue it would earn if all pieces paid proper postage (net overpayments of \$21.5 million versus approximately \$41.8 million if 380 million pieces paid \$0.11). If you do

not confirm, please provide the correct percentages and derivations for GFYs 1998 and 1999.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of Stephanie S. Wallace practice.

Washington, D.C. 20268-0001 March 24, 2000